

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

**NON-PARTY META PLATFORMS, INC.’S MEMORANDUM OF LAW  
IN SUPPORT OF MOTION TO SEAL**

Pursuant to Local Rule 5(C), non-party Meta Platforms, Inc. (“Meta”) respectfully submits this memorandum of law in support of its contemporaneously filed Motion to Seal (“Motion”). For the reasons that follow, Meta hereby requests that this Court temporarily seal Dkt. 788-1, Dkt. 788-2, Dkt. 788-3, and Exhibit 1 to the memorandum of law accompanying this motion, which Meta requests replace Dkt. 788-2 on the docket. In further support of its Motion, Meta states as follows.

**ARGUMENT**

On June 14, 2024, Meta filed a Motion and memorandum in support seeking to seal several documents submitted in connection with *Daubert* and summary judgment motions filed by the United States and Google. *See* Dkt. 784, 788. Discussed in and attached to Meta’s memorandum in support of that motion are the documents that Meta seeks to seal, with Meta’s proposed redactions. *See* Dkt. 788-1, Dkt. 788-2, Dkt. 788-3. However, those documents, as they appear elsewhere on the docket, are presently under seal and will remain under seal until this Court

resolves all motions to seal them, including motions that may have been filed by other non-parties. Out of an abundance of caution, to ensure that no confidential information is prematurely made public, Meta respectfully requests that this Court temporarily seal Dkt. 788-1, Dkt. 788-2, and Dkt. 788-3. At such time as this Court has resolved all motions to seal those documents, they can be unsealed in accordance with the orders of this Court.

In addition, attached as Exhibit 1 to this memorandum is a corrected version of Dkt. 788-2. This corrected version is limited to the pages of the Meta document at issue that were cited in and attached to the United States' filings. *See* Dkt. 663 at 29; Dkt. 663-15. For the same reasons as Dkt. 788-2, Meta asks this Court to temporarily seal Exhibit 1 to this memorandum. Meta also respectfully requests that Exhibit 1 to this memorandum replace Dkt. 788-2 on the docket.

June 17, 2024

Respectfully submitted,

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